

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

G. HOLDINGS LTD.,

Plaintiff,

V.

SAMSUNG ELECTRONICS CO., LTD. and  
SAMSUNG ELECTRONICS AMERICA  
INC.,

Defendant.

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Civil Action No.: 2:20-cv-00342-JRG

## JURY TRIAL DEMANDED

**P.R. 4-3 – JOINT CLAIM CONSTRUCTION AND PREHEARING STATEMENT**

Pursuant to Patent Rule 4-3, all parties to the above-captioned action hereby submit their Joint Claim Construction and Prehearing Statement regarding U.S. Patent Nos. 7,628,333 and 9,022,294.

**I. Construction of Claim Terms on which the Parties Agree**

Pursuant to P.R. 4-3(a)(1), the parties have been unable to agree upon any constructions.

**II. Each Party's Proposed Construction of Each Disputed Claim Term**

Pursuant to P.R. 4-3(a)(2), the parties have attached a chart hereto as Appendix 1, which shows each party's proposed construction of each disputed claim term, phrase, or clause, together with an identification of all references from the specification or prosecution history that support that construction, and an identification of any extrinsic evidence known to the party on which it intends to rely either to support its proposed construction or to oppose any other party's proposed construction, including but not limited to, as permitted by law, dictionary definitions, citations to learned treatises and prior art, and testimony of percipient and expert witnesses. Where intrinsic and extrinsic citations have been made for a particular claim term, phrase, or clause, they should be understood as applicable to each other instance where the same term, phrase, or clause appears elsewhere.

**III. Anticipated Length of Time for Claim Construction Hearing**

Pursuant to P.R. 4-3(a)(3), the parties anticipate that they will need a combined total of 3 hours for presentation at the Claim Construction Hearing.

**IV. Witness Testimony at Claim Construction Hearing**

Pursuant to P.R. 4-3(a)(4), the parties do not at this time anticipate calling witnesses at the Claim Construction Hearing.

**V. Other Issues for Prehearing Conference**

Pursuant to P.R. 4-3(a)(5), the parties do not believe there are any prehearing issues to be addressed by the Court.

Dated: April 9, 2021

Respectfully submitted,

/s/ Elizabeth L. Brann

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**COUNSEL FOR PLAINTIFF**  
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**CERTIFICATE OF SERVICE**

A true and correct copy of the foregoing instrument was served or delivered electronically via electronic mail, to all counsel of record, on this 9th day of April, 2021.

**/s/ Elizabeth L. Brann**  
Elizabeth L. Brann